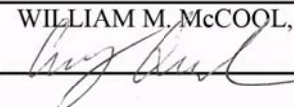


Presented to the Court by the foreman of the  
Grand Jury in open Court, in the presence  
of the Grand Jury and FILED in the U.S.  
DISTRICT COURT at Seattle, Washington  
July 29, 2020

WILLIAM M. McCOOL, Clerk  
By  Deputy

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,  
Plaintiff,

v.

(1) DELMER VELASQUEZ-LICONA,  
(2) RODRIGO ALVAREZ-QUINONEZ,  
(3) JORGE CRUZ-HERNANDEZ,  
(4) JUAN HERNANDEZ-HERNANDEZ,  
(5) JOSE FERNANDO ESCOTO-FIALLOS,  
(6) SAUL SUAREZ-MATA,  
(7) JORGE ALBERTO RAMOS, and  
(8) TARA SCOTT,

Defendants.

CASE NO. CR20-093 JCC  
**INDICTMENT**

The Grand Jury charges that:

**COUNT 1**

**(Conspiracy to Distribute Controlled Substances)**

Beginning at a time unknown, but within the past five years, and continuing until  
on or about July 29, 2020, in King County, within the Western District of Washington,  
and elsewhere, DELMER VELASQUEZ-LICONA, RODRIGO ALVAREZ-  
QUINONEZ, JORGE CRUZ-HERNANDEZ, JOSE FERNANDO ESCOTO-FIALLOS,  
SAUL SUAREZ-MATA, JORGE ALBERTO RAMOS, and others known and unknown,

1 did knowingly and intentionally conspire to distribute controlled substances, to wit:  
2 heroin and N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (Fentanyl),  
3 contrary to the provisions of Title 21, United States Code.

4 The Grand Jury further alleges that the conduct of DELMER VELASQUEZ-  
5 LICONA, RODRIGO ALVAREZ-QUINONEZ, SAUL SUAREZ-MATA, JORGE  
6 CRUZ-HERNANDEZ, and JOSE FERNANDO ESCOTO-FIALLOS, which includes the  
7 reasonably foreseeable conduct of other members of the conspiracy charged in Count 1,  
8 involved one kilogram or more of a mixture or substance containing a detectable amount  
9 of heroin.

10 The Grand Jury further alleges that the conduct of DELMER VELASQUEZ-  
11 LICONA, RODRIGO ALVAREZ-QUINONEZ, JORGE CRUZ-HERNANDEZ, SAUL  
12 SUAREZ-MATA, and JORGE ALBERTO RAMOS, as members of the conspiracy  
13 charged in Count 1 which includes the reasonably foreseeable conduct of the other  
14 members of the conspiracy charged in Count 1, involved 400 grams or more of a mixture  
15 or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-  
16 piperidinyl] propanamide (Fentanyl).

17 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A),  
18 and 846.

## 19 COUNT 2

### 20 (Distribution of Heroin)

21 On or about July 31, 2019, in the City of Seattle, within the Western District of  
22 Washington, DELMER VELASQUEZ-LICONA did knowingly and intentionally  
23 distribute a controlled substance, to wit: heroin, a substance controlled under Title 21,  
24 United States Code.

25 The Grand Jury further alleges that this offense was committed during and in  
26 furtherance of the conspiracy charged in Count 1, above.

27 All in violation of Title 21, United States Code, Sections 841(a)(1) and  
28 841(b)(1)(C).



**COUNT 3**

**(Possession of Heroin and Fentanyl with Intent to Distribute)**

On or about August 9, 2019, in the City of Seattle, within the Western District of Washington, DELMER VELASQUEZ-LICONA did knowingly and intentionally possess, with the intent to distribute, controlled substances, to wit: heroin and N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (Fentanyl), substances controlled under Title 21, United States Code.

The Grand Jury further alleges that this offense was committed during and in furtherance of the conspiracy charged in Count 1, above.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT 4**

**(Attempted Possession of Fentanyl with Intent to Distribute)**

On or about December 9, 2019, in King County, within the Western District of Washington, DELMER VELASQUEZ-LICONA, SAUL SUAREZ-MATA, and TARA SCOTT did attempt, and aid and abet the attempt, to knowingly and intentionally possess, with the intent to distribute, a controlled substance, to wit: N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (Fentanyl), a substance controlled under Title 21, United States Code.

The Grand Jury further alleges that this offense was committed during and in furtherance of the conspiracy charged in Count 1, above.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

**COUNT 5**

**(Possession of Methamphetamine, Heroin, and Fentanyl with Intent to Distribute)**

On or about December 9, 2019, in the City of Shoreline, within the Western District of Washington, TARA SCOTT did knowingly and intentionally possess, with the intent to distribute, and aid and abet the possession of with the intent to distribute,

1 controlled substances, to wit: methamphetamine, heroin, and N-phenyl-N-[1-(2-  
2 phenylethyl)-4-piperidiny] propanamide (Fentanyl), substances controlled under Title  
3 21, United States Code.

4 The Grand Jury further alleges that this offense involved 50 grams or more of a  
5 mixture or substance containing a detectable amount of methamphetamine, its salts,  
6 isomers, or salts of its isomers.

7 The Grand Jury further alleges that this offense involved 40 grams or more of a  
8 mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-  
9 4-piperidiny] propanamide (Fentanyl).

10 All in violation of Title 21, United States Code, Sections 841(a)(1) and  
11 841(b)(1)(B) and (C), and Title 18, United States Code, Section 2.

12 **COUNT 6**

13 **(Possession of Fentanyl with Intent to Distribute)**

14 On or about December 31, 2019, in the City of Seattle, within the Western District  
15 of Washington, DELMER VELASQUEZ-LICONA, JORGE CRUZ-HERNANDEZ, and  
16 JUAN HERNANDEZ-HERNANDEZ, did knowingly and intentionally possess, and  
17 attempt to possess, with the intent to distribute, and aid and abet the possession of with  
18 the intent to distribute, a controlled substance, to wit: N-phenyl-N-[1-(2-phenylethyl)-4-  
19 piperidiny] propanamide (Fentanyl), a substance controlled under Title 21, United States  
20 Code.

21 The Grand Jury further alleges that this offense involved 40 grams or more of a  
22 mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-  
23 4-piperidiny] propanamide (Fentanyl) or 10 grams or more of a mixture or substance  
24 containing a detectable amount of any analogue of N-phenyl-N-[1-(2-phenylethyl)-4-  
25 piperidiny] propanamide (Fentanyl).

26 The Grand Jury further alleges that this offense was committed during and in  
27 furtherance of the conspiracy charged in Count 1, above.



1 All in violation of Title 21, United States Code, Sections 841(a)(1) and  
2 841(b)(1)(B), and Title 18, United States Code, Section 2.

3 **COUNT 7**

4 **(Distribution of a Fentanyl)**

5 On or about January 2, 2020, in the City of Seattle, within the Western District of  
6 Washington, DELMER VELASQUEZ-LICONA did knowingly and intentionally  
7 distribute a controlled substance, to wit: N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl]  
8 propanamide (Fentanyl), a substance controlled under Title 21, United States Code.

9 The Grand Jury further alleges that this offense was committed during and in  
10 furtherance of the conspiracy charged in Count 1, above.

11 All in violation of Title 21, United States Code, Sections 841(a)(1) and  
12 841(b)(1)(C).

13 **COUNT 8**

14 **(Possession of Heroin with Intent to Distribute)**

15 On or about January 15, 2020, in the City of Seattle, within the Western District of  
16 Washington, DELMER VELASQUEZ-LICONA, JORGE CRUZ-HERNANDEZ, and  
17 JOSE FERNANDO ESCOTO-FIALLOS did knowingly and intentionally possess, with  
18 the intent to distribute, and aid and abet the possession of with the intent to distribute, a  
19 controlled substance, to wit: heroin, a substance controlled under Title 21, United States  
20 Code.

21 The Grand Jury further alleges that this offense involved one (1) kilogram or more  
22 of a mixture or substance containing a detectable amount of heroin.

23 The Grand Jury further alleges that this offense was committed during and in  
24 furtherance of the conspiracy charged in Count 1, above.

25 All in violation of Title 21, United States Code, Sections 841(a)(1) and  
26 841(b)(1)(A), and Title 18, United States Code, Section 2.

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**COUNT 9****(Possession of Fentanyl with Intent to Distribute)**

On or about January 20, 2020, in the County of Lewis, within the Western District of Washington, RODRIGO ALVAREZ-QUINONEZ and JORGE ALBERTO RAMOS, did knowingly and intentionally possess, with the intent to distribute, and aid and abet the possession of with the intent to distribute, a controlled substance, to wit: N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (Fentanyl), a substance controlled under Title 21, United States Code.

The Grand Jury further alleges that this offense involved 400 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (Fentanyl).

The Grand Jury further alleges that this offense was committed during and in furtherance of the conspiracy charged in Count 1, above.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

**ASSET FORFEITURE ALLEGATIONS**

The allegations in Counts 1 through 9 of this Indictment are hereby realleged and incorporated by reference herein for the purpose of alleging forfeiture to the United States pursuant to Title 21, United States Code, Section 853. Pursuant to Title 21, United States Code, Section 853, upon conviction of the felony drug offenses charged in Counts 1 through 9, the defendants shall forfeit to the United States of America any and all property, real or personal, constituting or derived from, any proceeds the defendants obtained, directly or indirectly, as the result of such offenses, and shall further forfeit any and all property, real or personal, used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses. The property to be forfeited includes, but is not limited to, the following:

a. Sums of money representing the proceeds that each defendant individually obtained as a result of their commission of the above offenses.



***Substitute Assets***

If any of the property described above, as a result of any act or omission of the defendant:


- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

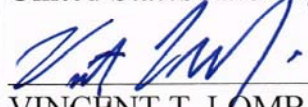
it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek the forfeiture of any other property of the defendants up to the value of the above-described forfeitable property.

A TRUE BILL:

DATED: July 20, 2020  
*(Signature of Foreperson redacted pursuant to the policy of the Judicial Conference of the United States)*

FOREPERSON

  
BRIAN T. MORAN  
United States Attorney

  
VINCENT T. LOMBARDI  
Assistant United States Attorney

  
STEPHEN HOBBS  
Assistant United States Attorney